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December 23, 2005

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Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Verizon Wireless Puerto Rico Request for Limited Waiver of GPS Handset
Penetration Rule, CC Docket No. 94-102

Dear Ms. Dortch:

On November 25, 2005, Puerto Rico Telephone Company d/b/a/ Verizon Wireless Puerto Rico ("VzWPR"), out of an abundance of caution, filed a request for limited waiver of the Commission's 95 percent E-911 handset penetration rule, Section 20.18(g)(1)(v), and the corresponding requirement at page 33 of the VzWPR Waiver Order.¹ At that time, 92 percent of VzWPR's customers had GPS-capable handsets,² and VzWPR expected to fall just short of the 95 percent milestone despite its best efforts to comply.³

Since this filing, VzWPR has continued its extensive efforts to meet the 95 percent milestone. In particular, VzWPR initiated a campaign to call all customers with non-GPS-capable handsets and offered them: (i) a choice between two free GPS-compliant handsets with the renewal of the customer's contract; (ii) a one-year contract term, rather than the usual two years; and (iii) 100 free minutes per month for three months. As a result, VzWPR reached 95 percent penetration of GPS-capable handsets on December 19, 2005 and is now in full compliance with Section 20.18(g)(1)(v) of the Commission's rules.

Therefore, VzWPR hereby requests to withdraw without prejudice its November 25, 2005 Request for Limited Waiver of the 95 percent E-911 handset penetration rule. Please contact the undersigned with any questions.

¹ Request for Limited Waiver of Verizon Wireless Puerto Rico, CC Docket No. 94-102 (filed Nov. 25, 2005).

² *Id.* at 3.

³ *Id.* at 12.

Wiley Rein & Fielding LLP

Marlene H. Dortch
December 23, 2005
Page 2

Sincerely,

/s/ Suzanne Yelen

Suzanne Yelen